

ANTHONY SAKALARIOS, ESQ.  
Morris, Sakalarios & Blackwell, PLLC  
1817 Hardy Street  
Hattiesburg, MS 39401  
(601) 544-3343  
Attorneys for Certain Asbestos Claimants

US BANKRUPTCY COURT  
DISTRICT OF DELAWARE  
2011 DEC 21 AM 10:30

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In Re:**

**W.R. Grace & Co.  
Debtor**

**Bankruptcy No. 01-1139-JKF  
Chapter 11**

**FEDERAL RULE OF BANKRUPTCY PROCEDURE  
2019 STATEMENT OF MULTIPLE REPRESENTATION  
BY MORRIS, SAKALARIOS & BLACKWELL, PLLC**

I, Anthony Sakalarios, a representative of Morris, Sakalarios & Blackwell, PLLC, declare as follows:

1. I am a shareholder with the law firm of Morris, Sakalarios & Blackwell, PLLC (hereinafter the "Firm"). I am a member in good standing of the bar of the State of Mississippi.
2. I am involved in the Firm's representation of personal injury claimants and based upon that representation and the review of business records of the Firm, I have personal knowledge of the facts set forth herein. I make this statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the "Statement").
3. The Firm, a professional limited liability company, is organized under the laws of the State of Mississippi, with its principal office for the practice of law located at 1817 Hardy Street, Hattiesburg, Mississippi 39401.
4. As of the date of this Statement, the Firm represents a number of personal injury claimants (the "Claimants" or individually, a "Claimant") who have been injured by asbestos or

asbestos-containing products manufactured, marketed, distributed, sold, installed, or produced by the above-referenced debtors and debtors-in-possession (the “Debtors”) and others, and thus hold claims against, *inter alia*, the Debtors. Provided to the Court and incorporated herein as Exhibit “A” is an excel spreadsheet outlining the name and personal address of each Creditor, form of agreement empowering Morris, Sakalarios & Blackwell, PLLC to act on behalf of each Creditor, amount of each Creditor’s claim, date of acquisition of each Creditor’s claim, type of each Creditor’s disease, and the pertinent facts regarding the employment of Morris, Sakalarios & Blackwell, PLLC. Each of these Claimants has employed the Firm under an employment contract with the Firm or with referring counsel. In the vast majority of instances these contracts include a General Power of Attorney. Additionally, most Claimants listed on the Excel Spreadsheet have executed a separate Power of Attorney granting me specific authority to cast their vote in this Bankruptcy. *See Spreadsheet which details which instrument counsel is relying upon as to each plaintiff.* In all cases, the Firm is authorized by law to act on the Claimant’s behalf. For reference and in accordance with Order entered by this Court, a specimen of the aforementioned powers of attorney is attached hereto as Exhibit “B.”

5. The address for each Claimant represented by the Firm is found on Exhibit “A” hereto.

6. The nature of the claim held by each Claimant is a personal injury tort claim for damages caused by asbestos or asbestos-containing products manufactured, marketed, distributed, sold, installed, or produced by the Debtors and others.

7. Each Claimant acquired his or her claim prior to the filing of the above-captioned bankruptcy case.

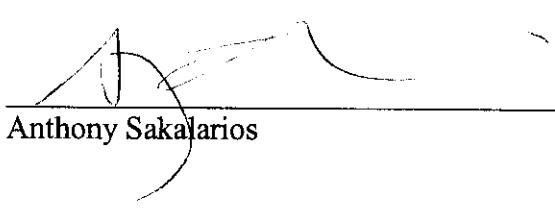
8. Each Claimant is represented by the Firm under a fee agreement. The Firm holds each such instrument.

9. At time of employment, Morris, Sakalaros & Blackwell, PLLC retained a contingency fee interest in each creditor's claim. The times when such interest was acquired in each claim depends upon the date each creditor signed his/her Employment Agreement. Amounts paid to date varies per creditor and Morris, Sakalaros & Blackwell, PLLC has not sold or disposed of any creditor's claims.

10. The filing of the Firm's Statement does not waive any rights including (i) the Claimants' rights to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) the Claimants' rights to trial by jury in any proceeding and any trial on their claims; (iii) the Claimants' rights to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal or abstention to the extent not previously directed; (iv) the Claimants' rights in not submitting themselves to the jurisdiction of the Bankruptcy Court; or (v) any other rights, claims, actions, defenses, reclamations, setoffs, or recoupments to which the Claimants are or may be entitled under any agreements, in law or in equity, all of which rights, claims, actions, defenses, reclamations, setoffs, and recoupments the Firm's Claimants expressly reserve.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this the 19th day of December, 2004, at Hattiesburg, Mississippi.



Anthony Sakalaros

# MORRIS, SAKALARIOS & BLACKWELL, PLLC

~ MARVIN MORRIS III  
SARA MORRIS FARRIS  
201 Hardy Street  
Hattiesburg, MS 39401

ANTHONY SAKALARIOS  
CHARLES BLACKWELL  
Telephone (888) 716-2404  
Facsimile (601) 544-3343

also admitted in Alabama

## CONTRACT OF REPRESENTATION

I, the undersigned, employ and retain Attorneys, F. Marvin Morris, III, Anthony Sakalarios, and Sara Morris Farris of Hattiesburg, Mississippi, and Charles G. Blackwell of Laurel, Mississippi (hereinafter "Attorneys"), as sole and irrevocable Attorneys at Law and in fact, until terminated by me in writing, to (1) investigate and evaluate my possible claim or claims, against any entities who may be liable for the injuries (if any) suffered by me and my family as a result of exposure to asbestos-related materials, and (2) therefore, if Attorneys agree to pursue this claim after investigation and evaluation, to represent my interest in any such claim. After the investigation of my claim, Attorneys shall have the right to withdraw and cancel this agreement.

I understand that Attorneys are not being employed or retained to advise me or file any type of claim for compensation pursuant to the Mississippi Workers' Compensation Act or any other workers' compensation act.

I employer Attorneys to execute all documents on my behalf and to do all things in connection with my claim deemed by them to be advisable, including hiring other Attorneys and filing any legal action necessary.

I assign to my Attorneys for their services a forty percent (40%) interest in and to any and all claims as described above including any settlement, verdict, judgement or recovery obtained in my case. I understand that the total amount of Attorneys fees I pay will include fees paid by Attorneys to any other Attorneys who may be employed to work on our case. I also hereby create and convey to Attorneys a lien on whatever monies may be received as a result of any settlement, verdict, recovery, or judgement in this action, and hereby assign and transfer to Attorneys such monies or such judgment to secure payment of the amount agreed to be paid for Attorneys services. I further agree that Attorneys have made no guarantee regarding the successful termination of such claim and all expressions relative thereto are matters of their opinion only; however, in the event that no recovery is had, then no Attorney fees will be due.

I understand that Attorneys will advance all expenses related to their obligations hereunder which include my explanation, but not limitation, litigation expenses, filing fees, service of process fees, medial record and examination fees, court reporter expenses, investigation expenses, photographs and photo-reproduction expenses, telephone and copy charges, postage, and reasonable travel expenses, but that those expenses will be deducted from my settlement over and above the forty percent 40% Attorney fee and I will be responsible for all such expenses to be reimbursed out of any recovery.

Date: \_\_\_\_\_

Client

Social Security Number: \_\_\_\_\_

Phone: \_\_\_\_\_

Address: \_\_\_\_\_

EXHIBIT

B

**General Power of Attorney**

To: F. Marvin Morris, III, Anthony Sakalarios & Charles G. Blackwell  
Morris, Sakalarios & Blackwell, PLLC  
1817 Hardy Street  
Hattiesburg, MS 39401

The undersigned claimant hereby authorizes you, or any one of you, as attorney in fact for the undersigned and with full power of substitution to vote on any questions that may be lawfully submitted to creditors of any person or corporation who list asbestos liabilities (hereinafter "Debtor"), in any Chapter 11 filed on behalf of the Debtor; to vote, after review of the appropriate disclosure statements, for or against any Plan of Reorganization of the Debtor; and, in general, to perform any act not constituting the practice of law for the undersigned in all matters arising in this case.

Dated: \_\_\_\_\_

Signed: «FIRST\_NAME» «I» «LAST\_NAME» «JRSR»

By: \_\_\_\_\_  
Claimant's Signature  
Social Security #: «SS»

Address: «STREET»  
«CITY», «STATE» «ZIP»

SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

\_\_\_\_\_  
NOTARY PUBLIC

SEAL

MY COMMISSION EXPIRES: \_\_\_\_\_